UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

September 11, 1996

Mr. Philip Otis
U.S. Department of the Navy
Northern Division - NAVFAC
10 Industrial Highway
Code 1811/PO - Mail Stop 82
Lester, PA 19113-2090

Re: EPA's Comments on the Addendum Report, Additional Allen Harbor Wetland Sediment Samples, Facility-Wide Freshwater/Terrestrial Ecological Risk Assessment Report (ERA), dated 28 June 1996, Former Naval Construction Battalion Center, Davisville, RI

Dear Mr. Otis:

Pursuant to § 7.6 of the NCBC Federal Facility Agreement (FFA), the Environmental Protection Agency's (EPA) has reviewed the above referenced document. Please find our comments enclosed.

This Addendum Report provides analytical results and discussion of sediment sampling at three locations within a wetland located in the southwest corner of Allen Harbor, and in the down-gradient storm drainage flow path (easterly) from NCBC Sites 1, 2, 3 and 4. The wetland had not been sampled during previous investigations. There was concern that site-related contaminants could be impacting the wetland through surface water runoff or ground water discharge from Sites 1, 2, 3, or 4. The investigation was designed to close this potential sampling and evaluation data-gap in the Facility-Wide Freshwater/Terrestrial Ecological Risk Assessment for NCBC Davisville.

EPA concurs with the Report's conclusion that the contaminant levels detected in the three wetland sediment samples would not appreciably alter the findings of the food chain modeling evaluations contained in the Facility-Wide Ecological Risk Assessment. We believe this conclusion would be true for either the Watershed-based or the Ecological Exposure Zone modeling results.

If you have any questions concerning this letter, please contact me at (617) 573-5736.

Sincerely,

Christine A.P. Williams
Remedial Project Manager
Federal Facilities Superfund Section

Enclosure

cc: Richard Gottlieb, RIDEM
Walter Davis, NCBC
Tim Prior, USF&WL
Ken Finkelstein, NOAA
Jim Shultz, EA
Greg Tracey, SAIC
Marilyn Cohen, ToNK
Howard Cohen, RIEDC

EPA Review of the Addendum Report
Additional Allen Harbor Wetland Sediment Samples

1. EPA concurs with the Report's conclusion that the contaminant levels detected in the three wetland sediment samples would not appreciably alter the findings of the food chain modeling evaluations contained in the Facility-Wide Ecological Risk Assessment. We believe this conclusion would be true for either the Watershed-based or the Ecological Exposure Zone modeling results. The average and maximum concentrations for all contaminants of concern in the wetland, except one, were well below those previously observed and evaluated in the Allen Harbor watershed Risk Assessment. The only exception was PCB-Aroclor 1248 detected at low concentrations (25, 26, and 63 parts per billion) in the wetland sediments, but not otherwise reported above detection limits in earlier investigations. We do not believe these low concentrations, at only three sites within the watershed, would change food chain modeling predicted risk levels for any of the species/guilds evaluated.

2. Some additional evaluation of site-specific sediment related ecological risks would be appropriate and useful in providing a complete Facility-Wide ERA. We believe the Facility-Wide ERA provides a format for making such an evaluation in Section 6.2, "Sediment Risk Characterization". Discussion of the results in the Addendum Report could be augmented by similar evaluations of the three sampling locations within the wetland.

3. The addendum report should be incorporated into the ERA as an addendum and included in the final ERA table of contents.

4. An error was noted in the Addendum Report which states that "the concentrations of every analyte detected in this special wetland sediment sampling were lower than those previously reported for Allen Harbor sediments" [page 4, paragraph 4]. The analyte, Aroclor-1248, had an average concentration of 0.03325 mg/kg in the three wetland sediment samples (range of 0.019 to 0.063 mg/kg), and was listed as a chemical of concern (COC), whereas concentrations were nondetectable in the watershed sediment samples. The detected concentrations of Aroclor-1248 in the wetland sediment samples could increase the hazard quotient (HQ) for total Aroclor for the watershed; however, the increase would be slight, since data from only three additional samples would be factored into the equation in recalculating the watershed hazard quotient for total Aroclor.